

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

APRIL K. BARNETT,

Plaintiff,

vs.

**JP MORGAN CHASE BANK,
NATIONAL ASSOCIATION, as
successor by merger to
CHASE HOME FINANCE, LLC,**

Defendant.

**Civil Action No.
1:12-cv-01745-VEH**

**DEFENDANT'S EVIDENTIARY SUBMISSION
IN SUPPORT OF ITS
MOTION FOR PARTIAL SUMMARY JUDGMENT**

COMES NOW defendant JPMorgan Chase Bank, N.A., the successor by merger to Chase Home Finance, LLC ("Chase"), and, pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby submits the following evidentiary materials, true and accurate copies of which are attached hereto,¹ in support of its Motion for Partial Summary Judgment which has been filed today in the above-styled action. Chase adopts and incorporates those materials by reference in the Motion.

¹ Confidential and private information, including loan numbers and telephone numbers, have been redacted.

Exhibit	Description
1	Complaint (Doc. 1-1)
2	Defendant's August 17, 2012 Objections, Answers, and responses to Plaintiff's First Interrogatories and Request for production of Documents
3	Transcript of the December 12, 2011 deposition of plaintiff April K. Barnett, and exhibits thereto ²
4	Transcript of the December 11-12, 2011 (Volume I) deposition of Lanier Jeffrey
5	Transcript of the December 11-12, 2011 (Volume II) deposition of Lanier Jeffrey, and exhibits thereto
6	Expert report of Cornelia Rose Graves, M.D., dated January 14, 2013
7	Supplemental Expert report of Cornelia Rose Graves, M.D., dated January 30, 2013

Respectfully submitted, this the 1st day of **March, 2013**.

Attorneys for Defendant,
JPMorgan Chase Bank, N.A.,
as the successor by merger to
Chase Home Finance LLC:

/s/ Sandy G. Robinson

SANDY G. ROBINSON
CABANISS, JOHNSTON, GARDNER,
DUMAS & O'NEAL LLP
Post Office Box 2906
Mobile, Alabama 36652
Telephone: (251) 415-7300
Facsimile: (251) 415-7350
E-Mail: sgr@cabaniss.com

² Chase has removed exhibits 15-18 to Plaintiff's deposition (which are not cited to in Chase's Brief) from this Evidentiary Submission because they are Plaintiff's medical records. To comply with the Court's requirement that entire copies of any cited deposition be filed, however, Chase is separately seeking leave to file these exhibits under seal.

/s/ Michael E. Turner

MICHAEL E. TURNER

/s/ Jason W. Bobo

JASON W. BOBO

CABANISS, JOHNSTON, GARDNER,
DUMAS & O'NEAL LLP

2001 Park Place North, Suite 700

Birmingham, Alabama 35203

Telephone: (205) 716-5200

Facsimile: (205) 716-5389

E-Mail: met@cabaniss.com
jwb@cabaniss.com

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and accurate copy of the foregoing **DEFENDANT'S EVIDENTIARY SUBMISSION IN SUPPORT OF ITS MOTION FOR PARTIAL SUMMARY JUDGMENT** to be electronically filed with the Clerk of Court for the United States District Court for the Northern District of Alabama, which will send electronic notification of such filing to all counsel of record.

This the 1st day of **March, 2013**.

/s/ Michael E. Turner

OF COUNSEL